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Counsel for JPMorgan Chase Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN AND WENDY PORZIO,

Plaintiffs,

V

JPMORGAN CHASE BANK, N.A.,

Defendant.

Case No. 2:25-cv-01097-GMN-NJK

**STIPULATION AND ORDER
CONTINUING DEADLINE FOR
DEFENDANT TO FILE RESPONSIVE
PLEADING TO PLAINTIFFS'
COMPLAINT**

[FIRST REQUEST]

Defendant, JPMorgan Chase Bank, N.A. (“Chase”) and Plaintiffs, John and Wendy Porzio (“John” and “Wendy,” respectively, or, collectively, “Plaintiffs”), through counsel of record, hereby stipulate and agree as follows:

1. Plaintiffs filed a Complaint against Chase on June 20, 2025.

2. Plaintiffs served the Complaint on a Chase branch on June 26, 2025.

3. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Chase's deadline to respond to the
plaintiff is July 17, 2025.

Complaint is July 17, 2025.

4. Chase retained counsel on July 15, 2025. Chase's counsel requires additional time to review Plaintiffs' Complaint, the issues in dispute, and documents within Chase's files, to prepare an appropriate response to the Complaint.

5. Therefore, as a professional courtesy to Chase's counsel, the parties agree to a

1 twenty-one (21) day extension for Chase to file its response to the Complaint, making the deadline
 2 to respond **August 7, 2025.**

3 6. This is the first request for an extension to file a response to the Complaint.

4 7. This request is made in good faith and not for the purpose of delay. Rather, the
 5 parties believe that the requested continuance will further the interests of efficiency and judicial
 6 economy as it will provide sufficient time to evaluate the Complaint and prepare an appropriate
 7 response.

8 THEREFORE, and for good cause shown, the parties respectfully request that the deadline
 9 for Chase to file a response to the Complaint be extended up to and including **August 7, 2025.**

10 **IT IS SO STIPULATED.**

11 DATED this 16th day of July, 2025.

12 **GREENBERG TRAURIG, LLP**

13 */s/ Jerrell Berrios*

14 JACOB D. BUNDICK, ESQ.
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 15 JERRELL L. BERRIOS, ESQ.
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 16 10845 Griffith Peak Drive, Suite 600
 Las Vegas, Nevada 89135

17 *Counsel for JPMorgan Chase Bank, N.A.*

18 DATED this 16th day of July, 2025.

19 **BARTHEL LEGAL, APC**

20 */s/ Nicholas Barthel*

21 NICHOLAS BARTHEL, ESQ.
 Nevada Bar No. 15386
 2173 Salk Avenue
 Suite 250
 Carlsbad, California 92008

22 *Counsel for John and Wendy Porzio*

23 **IT IS SO ORDERED:**

24 
 25 _____
 26 UNITED STATES DISTRICT JUDGE /
 27 UNITED STATES MAGISTRATE JUDGE

28 DATED: July 16, 2025